

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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Application of the North American Numbering
Plan Administrator, on behalf of the California
Telecommunications Industry, for Relief of the
760 Numbering Plan Area

Application 07-06-018

(Filed June 18, 2007)

**RESPONSE OF
JOINT TELECOMMUNICATIONS CARRIERS**

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Carriers**

Date: July 20, 2007

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Pursuant to Rule 2.6(c) of the California Public Utilities Commission's ("Commission") Rules of Practice and Procedure ("Rules"), Verizon Wireless, Pacific Bell Telephone Company d/b/a AT&T California ("AT&T California"), Sprint Nextel Corporation, New Cingular Wireless PCS, LLC d/b/a AT&T Mobility ("AT&T Mobility"), Omnipoint Communications Inc. d/b/a T-Mobile ("T-Mobile"), Sprint-Nextel, and Verizon California Inc. (hereafter referred to collectively as the "Joint Telecommunications Carriers") hereby respond to the above-referenced Application filed by the North American Numbering Plan Administrator ("NANPA") on June 18, 2007 with recommendations to the Commission on area code relief for the 760 Numbering Plan Area ("NPA"). Collectively, the Joint Telecommunications Carriers provide telecommunications service to the vast majority of consumers in the 760 NPA.

I. OVERVIEW

On June 18, 2007, NANPA filed the above-referenced Application for area code relief to the 760 NPA. In the Application, NANPA made its primary request to the Commission to approve an all-services distributed overlay based on the consensus reached in the industry

planning process.¹ NANPA also indicated that, to the extent that the Commission does not approve the preferred overlay and instead decides to adopt a geographic split, industry consensus favored Alternative #4 among the various split alternatives. If a split is adopted, all numbers located in geographic area designated to receive the new area code will need to be switched to the 442 NPA. Consistent with past practices, NANPA and the industry did not recommend which geographic area should be allowed to keep the 760 NPA or be required to change numbers to the new 442 NPA.

The Joint Telecommunications Carriers strongly support the primary recommendation that an all-services overlay should be adopted to provide numbering relief for the 760 NPA. As detailed below, an overlay has numerous advantages over an area code split. Significantly, the carriers participating in this Response expressly supported an overlay and some made statements for the record that they are opposed to any relief other than an overlay for the 760 NPA.

Unlike an overlay, an area code split would not treat consumers who have a 760 telephone number today in an equitable manner. A split would force half of the customers in the 760 NPA to unnecessarily change their phone number requiring them to contact their family, friends and business associates to provide them with their new number. An area code split would place potentially onerous financial burdens on small business owners and operators in the affected area by requiring them to change their company stationery, business cards, and

¹ As set forth in the Application, p. 1, n.3, consensus is established in the relief planning process when substantial agreement has been reached among those participating in the issue at hand. Substantial agreement means more than a simple majority, but not necessarily unanimous agreement. Consensus thus can reflect various degrees of support. For example, all of the participating carriers in the planning process supported an overlay except for Cox Communications and Citizens/Frontier creating a very high level of consensus on the preferred route. In contrast, the consensus on the split only reflects a preference for Alternative # 4 among various splits considered – not that a split is supported by most carriers.

advertisements in addition to contacting their existing customers to inform them of a new business phone number.

The success of the recent 310 overlay in the Los Angeles area demonstrated that an overlay can be smoothly implemented in California in an effective and efficient manner that will minimize adverse impacts to consumers. Overlays represent a progressive approach to introducing additional numbering resources and are currently the most prevalent form of area code relief adopted by state commissions across the country, including the newest overlay adopted on July 12, 2007 in Utah. In contrast, splits by definition make half of the existing customers “winners” because they get to keep their number and the other half “losers” requiring them to bear the entire burden of making necessary changes to accommodate the introduction of a new area code. Significantly, the benefits of an overlay apply regardless of the geographic size of the existing NPA or the urban, suburban, or rural nature of the area.

The adoption of an overlay as the relief method for the 760 NPA would treat all consumers equally and could, along with the experience from the 310/424 overlay, serve as a model for a consistent policy for providing additional numbering resources to Californians across the state. Considering that there are sixteen other California NPAs expected to exhaust within the next decade or less,² developing a consistent policy for area code relief in the state will facilitate future relief plans and will help to avoid ongoing consumer confusion -- the ultimate goal of any consumer education program endorsed by the Commission.

² See NANPA’s April 2007 NPA Exhaust Analysis at See NANPA’s April 2007 NPA Exhaust Analysis at http://www.nanpa.com/pdf/NRUF/2007_1_NPA_Exhaust_Projections.pdf

II. RESPONSE

A. The All-Services Overlay is Far Superior to a Geographic Split in the 760 NPA

In the Application, NANPA correctly reports that the Industry reached consensus for an all-services overlay as the preferred mechanism to address the pending exhaust of the 760 NPA. Indeed, each of the Joint Telecommunications Carriers endorsed the overlay as a superior approach and some specifically opposed any geographic split option.³ The only reported industry dissenter was Cox Communications (with concurrence from Citizens/Frontier) but even its support for a split was conditioned on Cox and its customers remaining in the 760 NPA.⁴ In fact, the “choice” presented in the Application creates some confusion. But for Cox and Citizens/Frontier’s dissenting view, the industry consensus would have been unanimously in support of an overlay. The recommendation of Alternative #4, a geographic split, was included *only* to note a level of consensus that #4 was preferred among the splits considered and should not be construed as general industry support for *any* split. In any event, for the reasons detailed below, the proposed all-services overlay is vastly superior to any split.

1. Unlike a Split, there are no “Winners” or “Losers” in an Overlay

As was well documented in D.05-08-040, a split inequitably burdens one half of the existing customers and in some cases will require customers to change numbers already changed more than once in prior splits. Simply put, splits lead to more splits, forcing progressively more

³ See e.g., Exhibit D, p. 4.

⁴ Exhibit F, p. 2. Citizens/Frontier concurred in Cox’s statement. One can reasonably assume that Cox would not support a split if the company and their customers’ numbers were among the half required to change numbers to the new NPA. See also, Statement of Esther Northrup of Cox that “Cox supports an area code split that retains the 760 area code on the San Diego County side of the split line. Exhibit G, p. 2.

consumers to unnecessarily change their phone numbers. As witnessed throughout the state, many consumers residing in the same geographic area have repeatedly been required to change their phone number due to the implementation of an area code split. The history of the 760 NPA bears out this experience; certain long-time residents and businesses now in the 760 NPA have already had phone numbers in the 213, 714, 619, and 760 NPAs and could now face a fourth number change to the new 442 NPA – all without ever moving their residences or businesses. In comparison, overlays lead to more overlays, allowing current consumers to keep their phone numbers, regardless of the need for future area code relief in that geographic area.

For those customers required to change their numbers, the problems associated with a split range from the inconvenience of residential customers having to tell friends and family members of their new numbers to enormous costs imposed on small and large businesses associated with changing out business cards, printed invoices, stationery, and other media. For some small businesses, the outcome can become even more disastrous by losing contact with satisfied customers. The loss of an established phone number for the independent business operator such as real estate agent, broker or contractor, who relies heavily on repeat and referral business, could place them at a competitive disadvantage, jeopardize their business, and result in severe, financial loss to that individual's livelihood.⁵

Indeed, during the Carlsbad public meeting, one individual reported that the last area code split had resulted in losses to his business between \$50,000 and \$100,000.⁶ Other

⁵ For example, a roofing company may have done superior work for a customer who, due to long expected life of the product, would not likely be a return customer for 10 years. For the company, a number change could result in that customer calling back years later only to find that the number has been reassigned. At that point, the customer may assume that the company went out of business.

⁶ Application, Exhibit C, p. 4. Such exhibit contains Commission Staff summaries of speaker comments made at the public meetings in Apple Valley, Palm Springs, Carlsbad, and El Centro

customers expressed frustration over repeated splits in the past and the resulting burden placed on them as individuals and business owners. By adopting an overlay, the Commission can avoid such unfortunate consumer experiences and circumvent similar damaging situations to residents and business owners.

The Public Service Commission of Utah recently reversed its former decision to use a split to add a third area code in that state and to instead implement an overlay over the existing 801 NPA.⁷ The Utah Commission specifically referenced the difficulty for consumers of changing numbers in splits as a primary justification for now concluding that an overlay is the better choice:

We agree with the Carriers' statement that '[p]erhaps the greatest advantage of an overlay over a split is that implementing an overlay will not require any consumers or businesses to change their telephone numbers....We previously recognized and continue to recognize that an area code split requires customers (whether residential or business) in the new NPA to incur the costs and inconvenience to inform and update their past contacts with their telephone numbers....We now have a greater appreciation of the detrimental impact that a split has on small businesses that would be forced to 'give back' their existing telephone numbers, a problem which is avoided by an overlay.⁸

Many people have different reasons why they need to maintain their current number, even for reasons that do not directly tie to geography. For some customers, a consistent number is the only way that they can remain connected. One commenter, listed as currently living in Alexandria, Virginia, expressed a preference for the overlay such that his current phone number would not change:

⁷ *In the Matter of the Petition for (801) Area Code Overlay & Abrogation and Rescission of 801 Area Code Split Order*, Docket No. 07-999-01, *Order Selecting Area Code Overlay, and Reversing April 13, 2000 Order Selecting Area Code Split*, issued July 12, 2007. ("Utah Overlay Order")

⁸ Utah Overlay Order, *mimeo*, pp. 5-6.

As part of a military family that moves every couple of years, we purposefully kept our cell phone numbers (with the 760 area code) because it is the surest way for family, friends, and former military co-workers to contact us no matter when/where we relocate.⁹

2. 10-Digit Dialing Protocol does not pose a significant obstacle to the smooth implementation of an Overlay

One of the main objections to overlays in earlier years was the concern for consumers to dial 10 digits on every call placed including calls within the area code. By now, the possibility of a telephone number change – and the resulting burdens associated with the change – outweighs the fear of 10-digit dialing for many customers. Most Californians are already comfortable with making many “local” calls between area codes and dialing 10 digits as part of their routine calling patterns. Many work in one area code, live in another and have friends and family in numerous others. Indeed, many newer residents of the eastern portions of the 760 have relocated from the coastal Los Angeles or San Diego regions and are already used to dialing 10 digits on a daily basis.

Historically, consumers have always adapted to new protocols for their phone service. As with any change, practices necessarily evolve to keep up with the times. Not so very long ago, telephone calls were made using an operator. Over time, calls were made requiring 3 or 4 digits, then 7 digits, then 10 digits between area codes. Overlays move one step further in this process by avoiding the significant problems with repeated splits by adding 10 digit dialing patterns for all calls made.

⁹ Application, Exh. E, comment reported on 1/15/2007.

3. Overlays provide a better customer experience throughout implementation because Splits pose technical challenges that do not exist with Overlays

A significant factor favoring overlays is the established fact that an overlay is easier on consumers and faster for carriers to implement than a geographic split. By using overlays, no existing customer will be required to change telephone numbers and costly and time-consuming modifications to central office switches are avoided. In addition, under a Split, wireless consumers in the area are required to change numbers. Some of these wireless customers will have older phones that cannot be reprogrammed “over the air” and may face additional inconvenience by needing to visit a retail store for manual phone reprogramming by wireless company personnel. If such phones are not successfully reprogrammed by the end of the Permissive Dialing Period, they may fail to work completely until the new number is programmed into the handset. This type of problem is avoided as well by the choice of an overlay.

Similarly, implementation of an overlay versus a split avoids technical issues recognized by carriers after the implementation of Local Number Portability (“LNP”). As identified by AT&T California representative George Guerra and supported by other carriers during the May 16, 2007 760 NPA Relief Planning Meeting, industry expertise demonstrates that it is technically difficult for carriers to comply with LNP requirements when an area code splits.¹⁰ Under those rules, the Number Portability Assignment Center (“NPAC”) houses all of the ported and pooled number data. During the night on which permissive dialing is initiated, NPAC personnel must update the database to include both the old and the new NPA. On the same night, all service

¹⁰ Application, Exhibit G, p. 2.

providers in the NPA must update their operational support systems with the new and old NPA so that port requests will complete within the designated time frames. Port requests can fail or create a backlog if the carriers' operational support systems are not in sync with the NPAC. If such coordination fails, calls can also be misrouted or denied leading to consumer dissatisfaction. In addition, service providers must update their networks so that both the old and the NPA are recognized in order that calls are correctly routed.

Overlays can also be implemented more quickly than a geographic split. For example, as noted in D.05-08-040, an overlay does not require a "permissive" dialing period as narrowly defined in Section 7931. Instead, the permissive dialing period refers only to the period during which customers can reach the same party by dialing either seven or ten digits. Carriers are well-prepared to provide public education, as demonstrated in the 310/424 overlay implementation.

B. Anticipated Arguments For A Split Do Not Mitigate The Harm to Consumers Forced to Change Telephone Numbers

Proponents of a split in the 760 NPA are likely to argue that a split is an appropriate method and will likely cite to the responses to a Commission survey and to the comparatively large geographic size of the existing 760 NPA. Neither of these arguments provides a compelling rationale for a split or against an overlay. The Joint Telecommunications Carriers urge the Commission to consider such arguments from the perspective of half the customers who would be required to change their numbers and face the burdens and problems discussed in the prior section.

1. The geographic size of the 760 NPA should not determine the choice of Split vs. Overlay

Split advocates likely will claim that the geographic size of the 760 NPA distinguishes it from area codes with less expansive geography, such as the 310 NPA in Los Angeles. This argument, however, completely ignores that many residents and businesses within the 760 NPA

have undergone numerous area code changes already and suffered the losses, costs and inconveniences associated with splits. To the individual now changing his or her number for the third or fourth time, the fact that the new NPA is smaller is hardly consolation and more likely will cause apprehension that yet another split will come in the future. Every customer forced to change his or her number will experience some difficulty in the process which could be avoided by an overlay.

The Joint Telecommunications Carriers stress that there are no technical obstacles or feasibility impediments that would prevent an overlay from being an effective choice in either a large or small geographic area and note their experience in implementing overlays nationwide in both small and large geographic regions. Geography is immaterial to the consideration of the actual carrier system changes, *e.g.*, over the air activations, number portability realities, that must be accomplished for implementation to succeed. For example, as discussed above, during the recent 909/951 Split – the only split implemented since number portability commenced – consumers experienced more problems related to porting their number in a split environment than after the 310 overlay. The carriers providing service in the 760 NPA are national and have national systems accustomed to dealing with a customer base across the United States. These systems can easily handle implementation of an overlay in the 760 NPA, just as they have across the nation. Thus, instead of worrying about the size of the area code and overlay, the Commission should focus its attention on the harm caused to consumers forced to change their numbers in split.

In addition, there can be no doubt that the demand for numbering resources in the current 760 NPA will continue to grow as projected in the decades to come. The Commission cannot know today where more or less growth will occur and where demand for numbers will be

highest. Rather than make educated guesses that a split today will avoid area code change in the future, consumers are better served by the implementation of an overlay now rather than face another split in the relatively near future. As previously noted, many of the customers in the 760 NPA have already endured one or more splits and learned first hand the burden of changing numbers. By adopting an overlay on top of the existing 760 NPA, no customers face this burden yet again and, as experience has shown in the 310 NPA and across the nation, consumers readily adapt to 10-digit dialing without worrying about yet another area code split.

Finally, there is no requirement that an overlay can only be implemented over tiny NPAs (such as the 310). In other states, overlays have effectively been used to avoid repeated splits and have covered large geographic areas and areas containing both urban and rural areas. Recent examples where area code overlays have been implemented in large geographic areas include the 903/430 overlay in northeastern Texas (part of the area is in metropolitan Dallas and part is in rural areas) and the 706/762 overlay (adjacent to the Atlanta metropolitan area at one edge but including large areas of more rural environment).¹¹ In Utah, the Commission just voted to implement an overlay over a large area in Central Utah. Indeed, if overlays had been available when California had many fewer area codes, Californians would not have experienced the continued shrinking of area codes in the state and repeated forced number changes and instead would have become accustomed to the “vertical” approach of overlays and the resulting need for

¹¹ Similarly, the entire state of Maryland is covered by two overlays. The 301/240 overlay covers the suburban Washington, DC area of Maryland as well as much more rural western Maryland. The other overlay, the 443/410 overlay includes the urban Baltimore area, the suburbs and all of the rural eastern shore of Maryland.

10-digit dialing.¹² With a decision to implement an overlay in the 760 NPA, the Commission avoids this impact and joins the progressive action taken in other states.

2. Data collected at Public Meetings and in website surveys is inconclusive and does not support a split over an overlay

Proponents of a split likely will proclaim that the customers have spoken out in favor of a split and infer that such sentiment is made out of opposition to overlays or fear of 10-digit dialing. Yet, the apparent support for a split versus an overlay in the limited consumer response to a survey¹³ on the Commission website and available at public participation meetings¹⁴ was skewed by the common assumption or hope by consumers that they will (or should) keep the 760 NPA in a geographic split while those “other people” will (or should) get the new area code. Indeed, even a casual review of the comments made at the public meetings and in the website survey shows that many of the consumers responding in support of a split did so on the condition that their area would keep the 760 NPA.¹⁵ One particularly forthcoming comment made by a Carlsbad resident supporting a split is emblematic of many comments:

Can we keep 760 in the North San Diego area? I don't want to have to spend money on new business cards and letterhead for my

¹² In New York, Illinois, Texas and Georgia, multiple overlays have been implemented over one geographic area rather than slice the area into smaller and smaller area codes to address demand for numbering resources in the New York City, Chicago, Houston, Dallas and Atlanta metropolitan areas.

¹³ Survey responses were included as Exhibit E to the Application.

¹⁴ Summaries of statements made at the Public Meetings are contained in the Application as Exh. C.

¹⁵ For example, Chuck Rabel of the Vista Chamber of Commerce supported a split if Vista residents can keep the 760 NPA. Application, Exhibit C, p. 4. Cox Communication supports the split *if* it and its customers can keep the 760 NPA in the San Diego area. Exhibit F, p. 2. Similar comments were made by residents and businesses in Palm Springs and the Victorville/Apple Valley areas in terms of supporting a split but only if they were able to keep the 760 NPA. It also seems that some on the desert side of the line supported overlays as a way to keep their existing numbers, perhaps perceiving that the San Diego side of the line could prevail in the split choice.

business. I know I know. It's a bit selfish. But what the heck? :)
Thank you.¹⁶

Comments such as this, of course, came from both “sides” of the potential split line despite the fact that only one side will keep the 760 NPA. Joseph R. Cocke, the Senior Relief Planner for NANPA, noted this “common theme” in the comments as well as the tendency of commenters to “automatically assume[] that they would keep [the 760 NPA] if there was a split.”¹⁷

The reality, of course, is that a geographic split will result in the need to change approximately half of the numbers in the 760 NPA. The Carlsbad resident quoted above presumably might change his or her mind if the North San Diego side received the 442 NPA, just as a Palm Springs resident supporting a split (based on his assumption that Palm Springs would keep the 760) will not be as favorable to a split requiring him to change business cards, letterhead, signage, etc. Ultimately, instead of showing conceptual support for a split or, more to the point, opposition to an overlay, the survey and public comments most clearly demonstrate that customers *most* value the retention of their current telephone numbers. An overlay will allow all of the current 760 NPA customers -- regardless of which side of the line they live -- to retain their telephone numbers. No other relief plan accomplishes this objective.

Moreover, since survey outcomes can easily be distorted by false assumptions by the individual, their weight must be minimized accordingly.¹⁸ For example, the Commission and

¹⁶ Exhibit E, comment reported on 1/15/2007. Exhibit E contains many similar statements by North San Diego County residents who indicated support for a split and a strong desire to keep their current number. Other residents, recognizing the importance of keeping their number, supported an overlay.

¹⁷ Exhibit D, p. 3.

¹⁸ Numerous commenters expressed confusion by the questions in general, indicated that the explanations of the choices were inadequate, or noted that the choice depended on which side of the split would keep the 760 NPA.

NANPA could have presented the situation as follows to capture a more realistic representation of consumers' views:

Two forms of area code change are being considered to address number shortages in the 760 NPA. One choice is a geographic split in which one side of the split line will be assigned a new area code while the other side has no changes.

The other choice is an overlay where no one in the area code will have to change their telephone number but all calls, including calls within the same area code, must be dialed including the area code.

Assume that if the split method is chosen, your home or business will be located in the area assigned the new NPA and you will have to change your telephone number. Given those circumstances, would you prefer a split or an overlay?

Using this question, the Commission would likely see that the outcome would strongly favor an overlay and provide a more meaningful evaluation of consumer preference when faced with a forced number change. Customers whose comments expressed concern about the cost and burden of changing their telephone numbers would face the reality of the impact on a split on the “losing side” and should logically be much more likely to support the overlay.¹⁹

C. While Adopting An Overlay For The 760 NPA, The Commission Should Establish A Policy Favoring Overlays Consistent With Progressive Regulatory Policy Across the Nation

When the Commission first considered an overlay for the 310 area code almost a decade ago, the overlay mechanism had not yet been used in California and was less common than it is today. Now, overlays are common and routine. Even in the August 2005 decision on the 310/424 overlay, the Commission noted that since the implementation of number pooling in

¹⁹ Interestingly enough, more comments were made by north San Diego Counties favoring a split and assuming that they would keep the 760 NPA, perhaps based on an impression that the more urban portion of the split tends to keep the original area code. If the survey question had informed such residents that they would have to change their number, support for the split would presumably have plummeted. In contrast, residents from the outlying areas were more likely to support an overlay perhaps based on their belief that an overlay was the most likely outcome to save their existing number.

November 2002, all area code relief within the United States (with the exception of the 909/951 area code split) had been done through overlays.²⁰ The Commission further noted that, at that time, 23 overlays had been implemented within 14 states.²¹ It is now widely recognized that the 310/424 overlay, including an education program, was successfully implemented.

Since 2005, this trend has continued such that there are now 71 overlays²² in total implemented in 18 states, the Territory of Puerto Rico, Canada and the Dominican Republic,²³ and since the implementation of the 909/951 Split in California, overlays were used in all but one implementation of area code change in the United States.²⁴

Throughout this same time period, this Commission has struggled with consumers' demand for new numbers within the State and mechanisms to deal with the exhaust of the California NPAs. Although the Commission was a pioneer on number conservation measures that extended the lives of many NPAs in the state, demand for numbers has resulted in California being split into 26 different geographic area codes with only one overlay recently implemented

²⁰ D.05-08-040, p. 16.

²¹ *Id.*

²² This number includes planned area code overlays that have been adopted by the state or other jurisdiction but have not yet been put into service.

²³ Puerto Rico and the following states have implemented (or ordered) at least one all-services overlay: California, Colorado, Florida, Georgia, Illinois, Massachusetts, Maryland, Michigan, Mississippi, North Carolina, New Jersey, New York, Ohio, Oregon, Pennsylvania, Texas, Utah and Virginia. Ten states have more than one overlay. Interestingly, even states with few area codes have adopted overlays. For example, Mississippi, Oregon, Maryland, Utah, and Colorado each have only 3 or 4 NPAs in total but have adopted an overlay to avoid further area codes splits.

In addition, Canada has five overlays and the Dominican Republic has one.

²⁴ Application, Exhibit C, p. 2. The one split adopted during that time was in New Mexico. The State of New Mexico previously had only one NPA for the entire state and was considering NPA relief implementation for the first time.

for the 310/424 NPAs.²⁵ In the carefully considered decision on that overlay, the Commission noted that no one approach would please all stakeholders but found that the overlay was the best choice.²⁶ Specifically, the Commission found that an overlay “avoids various problems involved with the geographic splitting of local communities” and eliminates “the economic hardships” of a number change.²⁷ Despite significant concerns that an overlay would cause transitional problems, carriers have found that the 310/424 NPA overlay implementation went very smoothly and resulted in fewer complaints than in prior splits.

All forecasts show that California will undoubtedly continue to grow both economically and in population growth and the demand for communications devices will follow or exceed that growth. In addition to the 760 NPA, California will face projected exhaust and relief planning in the 714 NPA (already in process in docket A.07-03-010) in 2008, the 818 NPA in 2009; the 408 NPA in 2010, the 415, 510 and 805 NPAs in 2012; and the 323, 619, 707 and 909 NPAs in 2013. Consumers care a great deal about not changing their telephone number, yet splits would continue to require such burden on huge numbers of Californians. Thus, at this juncture, rather than continue to split regions over and over again adding to the jigsaw puzzle of NPAs in the state, the Commission has an opportunity to adopt a prospective policy in favor of overlays as NPAs in California reach exhaust. By doing so, the Commission will move towards a consistent and progressive approach for numbering relief in California, allow consumers to keep their numbers into the future, and avoid revisiting this issue in detail in each planning effort.

²⁵ California once had only three area codes covering the entire state. By 1997, that number had increased to only 13.

²⁶ *Id.*, *mimeo*, p. 12

²⁷ *Id.*, p. 1

III. CONCLUSION

For the foregoing reasons, the Joint Telecommunications Carriers urge the Commission to adopt the all-services overlay as recommended in the Application and to reject the use of any geographic split in the 760 NPA. The Joint Telecommunications Carriers further encourage the Commission to consider the adoption of new policy guidance in its decision that the use of overlays is the preferred mechanism for area code relief within the State absent compelling circumstances to the contrary.

Respectfully submitted,

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Dated: July 20, 2007

Attorneys for Verizon Wireless and on behalf
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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing **Response of Joint Telecommunications Carriers**, by using the following service:

[] **E-mail service:** sending the entire document as an attachment to an e-mail message to all known parties of record to this proceeding who provided electronic mail addresses (see attached **Service List**).

[X] **U.S. Mail service:** mailing by first-class mail with postage prepaid to all known parties of record who did not provide electronic mail addresses. **Please see attached list re names and addresses.**

[] **Hand Delivery service:** delivering by messenger and/or courier to:

Executed this 20th day of July 2007, at San Francisco, California.

/s/ Barbara A. Murphy
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City Clerk
City of Calexico
608 Heber Avenue
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City Clerk
City of California City
21000 Hacienda Blvd.
California City, CA 93505

City Clerk
City of Ridgecrest
100 W. California Avenue
Ridgecrest, CA 93555

City Clerk
City of Barstow
220 East Mountain View Street, Suite A
Barstow, CA 92311

City Clerk
City of Bishop
377 West Line Street
P.O. Box 1236
Bishop, CA 93515

City Clerk
Town of Mammoth Lakes
P.O. Box 1609
Mammoth Lakes, CA 93546

City Clerk
City of Imperial
420 S. Imperial Avenue
Imperial, CA 92251

City Clerk
City of Calipatria
125 Park Street
Calipatria, CA 92233

City Clerk
City of Holtville
121 W. 5th Street
Holtville, CA 92250

County Clerk
Imperial County Board of Supervisors
940 Main Street
El Centro, CA 92243

County Clerk
Kern County Board of Supervisors
1115 Truxton Avenue, 5th Floor
Bakersfield, CA 93301

County Clerk
Inyo County Board of Supervisors
168 N. Edwards Street
Independence, CA 93526

County Clerk
Mono County Board of Supervisors
P.O. Box 237
Bridgeport, CA 93517

County Clerk
Riverside County Board of Supervisors
4080 Lemon Street – 5th Floor
Riverside, CA 92501

County Clerk
San Bernardino County Board of Supervisors
385 N. Arrowhead Avenue – 5th Floor
San Bernardino, CA 92415 – 0110

County Clerk
San Diego County Board of Supervisors
County Administration Center
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San Diego, CA 92101

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City of El Centro
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El Centro, CA 92243

City Clerk
City of Westmorland
355 South Center Street
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Westmorland, CA 92281

City Clerk
City of Blythe
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Blythe, CA 92225

City Clerk
Cathedral City
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Cathedral City, CA 92234

City Clerk
City of Coachella
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Coachella, CA 92236

City Clerk
City of Desert Hot Springs
65950 Pierson Blvd.
Desert Hot Springs, CA 92240

City Clerk
City of Indian Wells
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Indian Wells, CA 92210 – 7497

City Clerk
City of Indio
100 Civic Center Mall
Indio, CA 92201

City Clerk
City of Palm Desert
73-510 Fred Waring Drive
Palm Desert, CA 92260

City Clerk
City of La Quinta
P.O. Box 1504
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City Clerk
City of Palm Springs
3200 East Tahquitz Canyon Way
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City Clerk
City of Rancho Mirage
69-825 Highway 111
Rancho Mirage, CA 92270

City Clerk
City of Adelanto
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City Clerk
Town of Apple Valley
14955 Dale Evans Parkway
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City Clerk
City of Barstow
220 East Mountain View Street, Suite A
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City Clerk
City of Hesperia
9700 Seventh Avenue
Hesperia, CA 92345

City Clerk
City of Needles
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City Clerk
City of Twentynine Palms
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City Clerk
City of Carlsbad
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City of Encinitas
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City Clerk
City of Victorville
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Town of Yucca Valley
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City of Escondido
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City Clerk
City of Oceanside
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Oceanside, CA 92054

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City of San Marcos
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